



DELTA STEWARDSHIP COUNCIL

A California State Agency

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RE: Comments on the Water Plan Update 2018 Preliminary Draft (October 2017)

Dear Mr. Massera:

Thank you for the opportunity to comment on the Preliminary Draft for Water Plan Update 2018 ("Update 2018").

Established by the Sacramento-San Joaquin Delta Reform Act of 2009 (SBX7 1), the Delta Stewardship Council (Council) is an independent state agency charged with furthering California's coequal goals for the Delta through the adoption and implementation of the Delta Plan and its regulatory portions which became effective on September 1, 2013. As stated in the Delta Reform Act of 2009 (Delta Reform Act), the State has "'Coequal goals' (which) means two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place" (Water Code section 85054).

The Council has been engaged with the Department of Water Resources' (DWR) during development of Update 2018. As a member of the State Agency Steering Committee, we have reviewed the preliminary draft and would like to acknowledge the significant effort and extensive analysis that has gone into Update 2018. Update 2018 is the most recent Water Plan for the State of California, and identifies key needs and priority actions to move toward a more sustainable and robust water management system. While Update 2018 has a statewide scope, many of the priorities and recommended actions would also benefit the Sacramento-San Joaquin Delta (Delta), an area of critical importance to California's residents, water management system, natural environment, and economy. We are encouraged by DWR's

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– CA Water Code §85054

commitment to consult with stakeholders, proactive consideration of issues such as underserved communities and climate change impacts, and demonstrated desire to reflect stakeholder input obtained through workshops and outreach sessions.

Comments on the Preliminary Draft of Water Plan Update 2018

Overall, we are supportive of the current Update 2018 draft, and, as requested by DWR, here offer comments on select issues by chapter, as well as comments on the importance of quantitative performance measures.

Chapter 1

- Provides a clear description of needs, including acknowledgement of the necessity to adapt to and work within changing circumstances.

Chapter 2

- Chapter 2 clearly identifies key issues and drivers at a high-level. Many of the foundational drivers, such as climate change and sea level rise, have a strong nexus with the Delta. If the level of detail is appropriate, we encourage you to acknowledge the Delta as a key area that interacts with many of the issues and actions identified under Update 2018. This may be an area that could be further explored under a pilot study.
- We recommend a clearer connection to the Sustainability Outlook, which serves as a foundation of Update 2018. For example, a more complete description of each of the four areas under the Sustainability Outlook, or reference to an appendix (as currently proposed).
- DWR may wish to describe how environmental justice concerns and the recent State Water Resources Control Board work on the Human Right to Water (AB 685)¹ will be considered under Update 2018 or the Sustainability Outlook. Although environmental justice is briefly mentioned, we encourage DWR to consider this in more detail when implementing Sustainability Outlook pilot projects and sustainable water management profiles.

Chapter 3

- Chapter 3 identifies key roles for the State, as well as recommended actions. Furthermore, many of the recommended actions are consistent with the Delta Plan. These include the use of best available science and data to support decision making.
- The Council supports the open data approach for Update 2018, including references to AB 1755. The availability of accurate, consistent, and up-to-date data will help support implementation of Update 2018.
- The Council also is encouraged by consideration of watershed-based governance structures. The Delta depends on management actions not only in the Delta itself, but also a number of upstream watersheds that cross multiple jurisdictional boundaries.

¹ http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0651-0700/ab_685_bill_20120925_chaptered.pdf

Coordination of actions at a functional hydrologic scale – consistent with other jurisdictional requirements – is a useful approach to explore further.

- Regional engagement will be further developed in Water Plan update 2023. We encourage DWR to continue to work on this approach, and recommend the Delta as an important region to consider, both in continued engagement and potentially as a case study.

Chapter 4

- The Council appreciates the extensive work conducted to quantitatively identify funding needs. An important ongoing funding need identified in the Delta Plan is for adaptive management and monitoring and reporting programs. As Update 2018 is refined and implemented, we encourage DWR to consider how these funding needs may be highlighted or considered under Table 4-6.

Performance Measures

The Delta Plan acknowledges that fulfilling the Council's mission requires the development of performance measures "to address whether actions are producing expected results" (Delta Plan, Chapter 2). Delta Plan Appendix E (<http://deltacouncil.ca.gov/docs/attachment-1app-ecouncil-meeting-edits022916-red-line-version-appendix-e-administrative-0>) includes three performance measures related to the California Water Plan:

1. "DWR has modified the California Water Plan update to include specified categories of information to be tracked."
2. "Development of appropriate performance measures will be done by DSC [Delta Stewardship Council] in consultation with the agencies. These performance measures will be rolled into the California Water Plan Update."
3. "Information in updated Bulletin 118 is included in the next (2018) California Water Plan Update and the 2020 Urban Water Management Plans and Agricultural Water Management Plans."

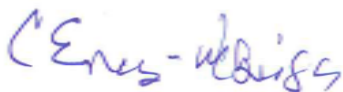
These performance measures correspond to two strategies outlined in the Delta Plan. The first two performance measures relate to Strategy 3.4: Improved Water Management Information and the third performance measures relates to Strategy 3.2: Improve Groundwater Management. On these strategies, the Delta Plan and Update 2018 align. The Council has three separate recommendations related to this for Update 2018:

1. DWR should continue to refine specific categories of information to be tracked that will improve water management information in the state. The Council suggests that this information may be appropriate in under Chapter 3 of Update 2018 ("Actions for Sustainability") and to be released Chapter 5 ("Funding and Implementation Plan", under the subsection "Annual Progress and Policy Guidance Report").

2. The Council has developed a number of performance measures for the Delta Plan, including a proposed performance measures amendment (from June 2017 Council meeting, <http://deltacouncil.ca.gov/docs/delta-stewardship-council-june-22-2017-meeting-agenda-item-10-attachment-1-proposed-performance>). These measures have been reviewed by several state agencies, the public, and the Council; and the proposed amendment is currently undergoing environmental review under the California Environmental Quality Act (CEQA). Once CEQA is complete and the full suite of performance measures are adopted by the Council, expected in early Spring 2018, we look forward to working with DWR on including appropriate performance measures into Update 2018.
3. The preliminary draft of the California Water Plan does not explicitly mention the updated Bulletin 118. Bulletin 118 is closely related to the Sustainable Groundwater Management Act (SGMA). The Council suggests an inclusion of information on the updated Bulletin 118 (2016) as it relates to SGMA and groundwater management in California, including topics such as water supply reliability and others that may go beyond SGMA itself.

The Council appreciates the opportunity to review the preliminary draft of California Water Plan Update 2018, and look forward to the opportunity to continue to work closely with DWR as it is finalized. If you would like to discuss further, or have any questions, please contact me at (916) 445-0258 or Cassandra.enos@Deltacouncil.ca.gov.

Sincerely,



Cassandra Enos-Nobriga
Deputy Executive Officer, Planning and Performance Division
Delta Stewardship Council